

1 MICHAEL KIND, ESQ.
2 KAZEROUNI LAW GROUP, APC
3 NEVADA BAR NO. 13903
4 6069 SOUTH FORT APACHE ROAD, SUITE 100
5 LAS VEGAS, NEVADA 89148
6 MKIND@KAZLG.COM
7 ATTORNEY FOR PLAINTIFF SETH DOLIBOA

8 UNITED STATES DISTRICT COURT
9 DISTRICT OF NEVADA

10 SETH DOLIBOA, individually and on behalf of all
11 others similarly situated,

12 Plaintiffs,

13 v.

14 ALLEGIANT AIR, LLC,

15 Defendant.

Case No.: 2:17-CV-02779-JCM-GWF

Class Action

**STIPULATION AND ~~PROPOSED~~
ORDER TO EXTEND DEADLINE
FOR PLAINTIFF SETH DOLIBOA TO
RESPOND TO DEFENDANT'S
MOTION TO STAY DISCOVERY**

(First Request)

18 COME NOW, Plaintiff Seth Doliboa ("Plaintiff") and Defendant Allegiant Air, LLC
19 ("Defendant") by and through their respective counsel of record in the above-captioned matter, and
20 hereby stipulate and agree, pursuant to LR 7-1 as follows:

21 IT IS HEREBY STIPULATED THAT:

22 1. Allegiant Air, LLC filed Allegiant Air, LLC's Motion to Stay Discovery ("Motion")
23 on March 23, 2018 and the hearing on Defendant's Motion is currently set for April 19, 2018.

24 2. The current deadline for Plaintiff to respond to Allegiant Air, LLC's Motion to Stay
25 Discovery is currently April 6, 2018.

26 3. Due to scheduling conflicts, Plaintiff's counsel is unavailable for the scheduled
27 hearing date.
28

1 4. To allow for appearance of all counsel and to allow counsel for Plaintiff to prepare
2 an appropriate response to Defendant's Motion to Stay Discovery ("Motion"), the parties agree to
3 continue the current hearing date of April 19, 2018 at 9:30 a.m. to **May 9, 2018 at 1:30 pm in**
4 **Courtroom 3A.**

5 5. Additionally, the parties agree that the deadline for Plaintiff to respond to
6 Defendant's Motion is hereby extended to **April 20, 2018**

7 6. Finally, Defendant's deadline to file its reply in support of the Motion is hereby
8 extended to **April 27, 2018.**

9 7. This is the first stipulation to continue the scheduled hearing and for extension of
10 time regarding the briefing schedule for Defendant's Motion.

11 8. This extension is not sought for any improper purpose.

12 Dated: April 5, 2018

Dated: April 5, 2018

13 **GREENBERG TRAURIG, LLP**

KAZEROUNI LAW GROUP, APC

14 By: /s/ Michael R. Hogue
15 MARK E. FERRARIO, ESQ.
16 JACOB BUNDICK, ESQ.
17 MICHAEL R. HOGUE, ESQ.
18 3773 HOWARD HUGHES PARKWAY
SUITE 400 NORTH
LAS VEGAS, NEVADA 89169
*ATTORNEYS FOR DEFENDANT ALLEGiant AIR,
LLC*

By: /s/ Michael Kind
MICHAEL KIND, ESQ.
6069 S. FORT APACHE ROAD, SUITE 100
LAS VEGAS, NEVADA 89148
MKIND@KAZLG.COM

LAW OFFICE OF FRANCIS J. FLYNN, JR.

FRANCIS J. FLYNN, JR.
6220 W. THIRD STREET, #115
LOS ANGELES, CA 90036
*ATTORNEYS FOR PLAINTIFF SETH DOLIBOA
INDIVIDUALLY AND ON BEHALF OF ALL OTHERS
SIMILARLY SITUATED*

IT IS SO ORDERED.


UNITED STATES MAGISTRATE JUDGE

DATED: 4/6/2018